

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:) Chapter 11
DESIGN AND PROCESSING) Case No. 15-21008
RESOURCES, INC.) Honorable Jack B. Schmetterer
Debtor.)

OBJECTION TO MOTION FOR FINAL DECREE

Unified Brands, Inc. (“*Unified*”), by and through its undersigned counsel, hereby files this objection (the “*Objection*”) to the *Motion for Final Decree* [Docket No. 103] (the “*Motion*”) filed by Design and Processing Resources, Inc. (the “*Debtor*”). In support hereof, Unified respectfully states as follows:

OBJECTION

1. On June 17, 2015 (the “*Petition Date*”), the Debtor filed a voluntary petition for relief under chapter 11 of the Bankruptcy Code (the “*Chapter 11 Case*”) in the United States Bankruptcy Court for the Northern District of Illinois (the “*Court*”).
 2. On July 10, 2015, Unified filed its proof of claim, claiming that it was owed \$129,047.55 (the “*Claim*”) for prepetition goods and/or services provided to the Debtor. The Debtor did not object to the Claim.
 3. On April 22, 2016, the Debtor filed the Plan and on June 9, 2016, this Court entered an order confirming the Plan.
 4. The confirmed Plan provided, *inter alia*, that the Debtor would pay general unsecured creditors 100% of their prepetition claims, plus 1% annual interest. Under the Plan, the Debtor must pay Unified \$3,640.00 per month over three years. *See Plan*, appendix.

5. On August 2, 2016, the Debtor filed the Motion, seeking to close the bankruptcy case.

6. Since confirmation of the Plan, the Debtor has failed to make Plan payments for the months of October, November, and December, 2016, resulting in a default of approximately \$10,920.00.¹

7. Given that the Debtor has failed to comply with the terms of the Plan, closing the case at this point would be harmful to Unified (and any other creditor that has not been paid pursuant to the Plan). Unified has reached out to Debtor's counsel on numerous occasions requesting an update and/or payment and has been told that payment is imminent multiple times. This case cannot be closed while the Debtor continues to be in default under the Plan and while the Motion to Compel is pending.

Dated: January 9, 2017

Respectfully submitted,

UNIFIED BRANDS, INC.

By: /s/ Sean P. Williams

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¹ Unified filed a *Motion to Compel Compliance with the Debtor's Confirmed Plan of Reorganization* [Docket No. 149] (the "Motion to Compel") contemporaneously herewith. Unified incorporates the arguments set forth in the Motion to Compel in this Objection.